

**ORIGINAL** 2 to CV  
IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JACK MARRONE, husband, KAREN  
MARRONE, wife, both individually and  
in their capacity as parents and guardians  
for VIDA MARRONE, a minor, and  
MATTHEW ADAM MARRONE,

Plaintiffs,

vs.

ALLSTATE INSURANCE COMPANY,  
LINDA M. EDLEMAN, FRED SCHAFER,  
MT. GRETNAL REALTY, and HOUSE  
MASTERS,

Defendants.

Civil Action No.: 1:CV-01-0773

**FILED**  
HARRISBURG, PA

MAY 30 2003  
(U.S. District Judge Yvette Kane)  
MARY E. DANDENEY, CLERK  
Per                     

**JURY TRIAL DEMANDED**

**PLAINTIFFS' RESPONSE TO THE RENEWED MOTION FOR  
SUMMARY JUDGMENT OF DEFENDANT HOUSEMASTER**

AND Now come the Plaintiffs, by and through their counsel of record,  
Tarasi, Tarasi & Fishman, P.C., Louis M. Tarasi, Jr., Esquire, and Gianni Floro,  
Esquire, and hereby file this Plaintiffs' Response to the Renewed Motion for  
Summary Judgment of Defendant Housemaster, and in support thereof set forth  
the following:

The Defendant Housemaster has moved for summary judgment in its favor  
and against Plaintiffs on Counts VIII though XI of the Amended Complaint and on

Plaintiffs request for personal injury damages in those counts. It broadly asserts that based upon the pleadings, depositions and record in this case that there are no genuine issues of material fact. Nevertheless, a review of the Plaintiffs' Counter Statement of Undisputed Material Facts Regarding the Renewed Motion for Summary Judgment of Defendant Housemaster reveals that there numerous issues of material fact which must be resolved by the trier of fact.

Wherefore, the Plaintiffs respectfully request that this District Court enter an Order Denying the Renewed Motion for Summary Judgment of the Defendant Housemaster.

Respectfully submitted,

TARASI, TARASI & FISHMAN, P.C.

By: 

Gianni Floro, Esquire

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